VIA ECF

June 6, 2025

Hon. Ona T. Wang
Southern District of New York

RE: *In re OpenAI Copyright Litigation*, 25-md-3143 (SHS) (OTW)

Dear Magistrate Judge Wang:

The Plaintiffs and OpenAI Defendants in the above referenced MDL have reached agreement on a Training Data Inspection Protocol (the "Protocol") in the form attached hereto as Exhibit A. The parties will promptly submit a finalized Protocol to the Court upon entry of a Protective Order, and in the meantime agree to be bound by the Protocol.

The parties agree that other Plaintiffs in the MDL should be granted access to the "cc-en-colang-v2-20220131-metadata" training dataset on conditions materially similar to those described in the Joint Stipulation Re: Security Protocol for Production of Training Dataset in *In Re OpenAI ChatGPT Litigation*, Case No. 23-cv-03223 Dkt. 325 (the "Security Protocol"). The parties agree to meet and confer in good faith about the technical requirements of modifying or supplementing the Security Protocol to implement this agreement. This agreement relates to "cc-en-colang-v2-20220131-metadata" and does not modify or supersede section 10 of the Security Protocol. The parties agree to meet and confer in good faith to discuss the production and export of additional datasets pursuant to the Security Protocol.

June 6, 2025   Respectfully submitted,

                                                      */s/ Justin Nelson*_____
                                                      Justin Nelson
                                                      Susman Godfrey L.L.P.
                                                      On behalf of Class Plaintiffs

                                                      */s/ Jennifer Maisel*____
                                                      Jennifer Maisel
                                                      Rothwell, Figg, Ernst & Manbeck P.C.
                                                      On behalf of News Plaintiffs

                                                      */s/ Thomas Gorman*_____
                                                      Thomas Gorman
                                                      Keker, Van Nest & Peters LLP
                                                      On behalf of OpenAI